

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

EK VENTURES I, LLC; DAVID L. TAYLOR;  
DAVID L. TAYLOR AND VIRGINIA L.  
TAYLOR as TRUSTEES FOR THE TAYLOR  
FAMILY REVOCABLE TRUST; and  
FLEXTRONICS INTERNATIONAL LTD.,

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.  
PUBLICATIONS, INC.,

Defendants.

*and*

JAMES R. BARTLETT,

Third Party Plaintiff

v.

GLOBALWARE SOLUTIONS, INC.,  
ANTHONY RUDSTON and BRADLEY A. JAY,

Third Party Defendants.

CIVIL ACTION

No. 03 CV 12506 NMG

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES FROM  
DEFENDANT JAMES BARTLETT**

Pursuant to Fed.R.Civ.P. 37(a) and LR 37.1, Plaintiffs move this court for an order compelling Defendant James Bartlett to produce documents in response to Request Nos. 26, 27 and 30 of Plaintiffs' First Request for Production of Documents.

As grounds therefor, Plaintiffs incorporate the accompanying Memorandum In Support of Plaintiffs' Motion To Compel Defendant James Bartlett To Respond To Discovery Requests.

For the reasons set forth in that memorandum, Plaintiffs request that the Court enter an order compelling Defendant James Bartlett to produce documents in response to Request Nos. 26, 27, and 30 of Plaintiffs' First Request For Production Of Documents, and imposing terms on Defendant Bartlett, his counsel, or both.

Dated this 24 day of November, 2004.

Respectfully submitted on behalf of the Plaintiffs, EK Ventures I, LLC; David L. Taylor; David L. Taylor and Virginia L. Taylor as Trustees for the Taylor Family Revocable Trust; and Flextronics International Ltd.



Jerold T. Everard, WSBA # 17142

Douglas R. Roach, WSBA # 21127

*Admitted Pro Hac Vice*

GROFF MURPHY TRACHTENBERG  
& EVERARD

300 East Pine Street

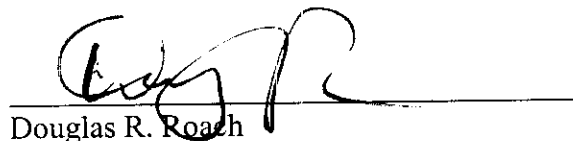
Seattle, Washington 98122

Telephone: (206) 628-9500

Facsimile: (206) 628-9506

**CERTIFICATE OF COMPLIANCE**

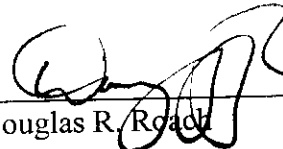
The undersigned certifies that the provisions of LR 37.1 have been complied with.



Douglas R. Roach

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on counsel for all parties via first-class mail/electronically on November 24, 2004.

  
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Douglas R. Roach